

EXHIBIT A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Montage Mortgage, LLC,

Plaintiff,

vs.

**Pacific Union Financial, LLC, John Perry,
Valerie Coleman, Caitlin V. Cooke, Eduardo
Creque, Jessica M. Furr (Keen), Kathy
Keller, Fouad Naghmi, Tammy Neal,
Charles F. Peer, Michaelene Whyte, and
Melissa Willoby,**

Defendants.

Case No.: 3:17-cv-02971-B

**Declaration in Support of Motion to
Dismiss**

DECLARATION OF MICHAELENE WHYTE

I, Michaelene Whyte, declare:

1. I am over the age of eighteen (18) years, and am fully competent to make this declaration.

This declaration is based upon personal knowledge.

2. I submit this declaration in support of the Reply to Plaintiff's Opposition to the Motion to Dismiss Second Amended Petition filed by Individual Defendants Coleman, Cooke, Creque, Furr, Keller, Naghmi, Neal, Peer, Whyte, and Willoby.

3. I am employed by Defendant Pacific Union as a loan processing manager for the Mid-Atlantic region.

4. As a loan processing manager, my job duties include, among other things, overseeing a team of loan processors to ensure that loan files are complete and are on track to close timely.

5. As a loan processing manager, I have no control over which loans are assigned to my team for processing. My team, however, primarily processes loans for borrowers residing in or purchasing property in the Mid-Atlantic region.
6. As a loan processing manager, I do not solicit borrowers, originate loans, or possess any licenses that authorize me to do so.
7. As a loan processing manager, I receive a few hundred emails per day.
8. With respect to Exhibits K and L, App. 044-047, at the time I made my initial declaration in support of the Motion to Dismiss filed by Individual Defendants, I did not recall being assigned by Defendant Pacific Union to process this Texas-based loan.
9. With respect to Exhibits K and L, App. 044-047, these emails refresh my recollection that in processing this file, I requested additional information regarding the credit report and title-related information for this borrower.
10. I processed the loan referenced in Exhibits K and L, App. 044-047, from my home state of Florida and took no actions in or directed towards Texas to do so.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this the 12 day of December, 2017.

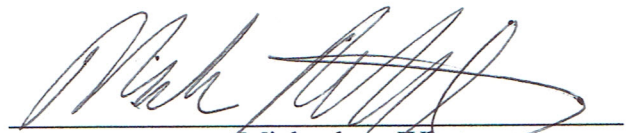

Michaelene Whyte

EXHIBIT B

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Montage Mortgage, LLC,

Plaintiff,

vs.

**Pacific Union Financial, LLC, John Perry,
Valerie Coleman, Caitlin V. Cooke, Eduardo
Creque, Jessica M. Furr (Keen), Kathy
Keller, Fouad Naghmi, Tammy Neal,
Charles F. Peer, Michaelene Whyte, and
Melissa Willoby,**

Defendants.

Case No.: 3:17-cv-02971-B

**Declaration in Support of Motion to
Dismiss**

DECLARATION OF EDUARDO CREQUE

I, Eduardo Creque, declare:

1. I am over the age of eighteen (18) years, and am fully competent to make this declaration.

This declaration is based upon personal knowledge.

2. I submit this declaration in support of the Reply to Plaintiff's Opposition to the Motion to Dismiss Second Amended Petition filed by Individual Defendants Coleman, Cooke, Creque, Furr, Keller, Naghmi, Neal, Peer, Whyte, and Willoby.

3. Before I was terminated by Plaintiff, I closed the majority of the loans pending in my pipeline. None of the borrowers that I worked with while employed by Plaintiff followed me to, or chose to close loans with, Defendant Pacific Union.

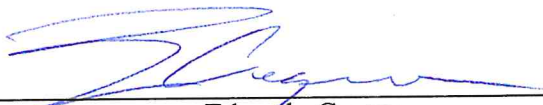
4. With respect to Exhibit CC, App. 095-096, this email was sent to me and others from a Fairfax, Virginia-based Pacific Union employee. Although I had an active Pacific Union email

address at the time, this email was sent to my personal email address. Accordingly, I forwarded the email to my Pacific Union email address.

5. With respect to Exhibit DD, App. 097-098, I have not worked with, nor have I generated through my referral sources, any of the borrowers listed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this the 13th day of December, 2017.



Eduardo Creque